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December 9, 2020

VIA ECF

Honorable Carol Bagley Amon
United States District Judge
United States District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Bartlett, et al. v. Société Générale de Banque au Liban
S.A.L., et al., 19 Civ. 007 (CBA) (VMS)

Dear Judge Amon:

On behalf of the Moving Defendants,¹ we write to request an extension of the Moving Defendants' deadline to answer the Amended Complaint until such time as the Court rules on the Moving Defendants' proposed motion for a stay of proceedings. *See* ECF No. 167. Plaintiffs have agreed to the requested extension.

On November 25, 2020, the Court denied, in part, the Moving Defendants' motions to dismiss. ECF No. 164. In light of the highly contested nature of the issues addressed in the Court's decision and the fact that several appeals are currently pending before the Second Circuit that may bear on those issues, the Court expressly invited the parties to seek a stay. *Id.* at 37-38. The Moving Defendants did so on December 8, 2020, by filing for a pre-motion conference seeking leave to move for a stay and interlocutory appeal under 28 U.S.C. § 1292(b). ECF No. 167.

To avoid potentially unnecessary expense, the Moving Defendants respectfully request that their deadline to file an answer—which is currently December 9, 2020 pursuant to Federal Rule of Civil Procedure 12(a)—be adjourned *sine die* while the Court considers the Moving Defendants'

¹ The Moving Defendants are (1) Société Générale de Banque au Liban S.A.L., (2) Fransabank S.A.L., (3) MEAB Bank s.a.l., (4) BLOM Bank S.A.L., (5) Byblos Bank S.A.L., (6) Bank Audi S.A.L., (7) Bank of Beirut S.A.L., (8) Lebanon & Gulf Bank S.A.L., (9) Banque Libano Française S.A.L., (10) Bank of Beirut and the Arab Countries S.A.L., and (11) Fenicia Bank s.a.l.

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stay request. There have been no prior requests for extensions of this deadline, and the granting of this request will not impact other scheduled deadlines. As noted, Plaintiffs consent to this request.

The Moving Defendants thank the Court in advance for its consideration.

Respectfully submitted,

/s/ Mark G. Hanchet

Mark G. Hanchet

Cc: Counsel of Record (via ECF)